

From: [Payton, Richard](#)
To: [Brown, Ethan](#)
Subject: FW: Notice of Intent to File EE for Wildfire Smoke, Aug. 6-7, 2017
Date: Wednesday, April 4, 2018 11:04:04 AM

From: Joel Karmazyn [mailto:jkarmazyn@utah.gov]

Sent: Sunday, September 10, 2017 11:09 AM

To: Payton, Richard <Payton.Richard@epa.gov>

Cc: mberger@utah.gov; Ostigaard, Crystal <Ostigaard.Crystal@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Bill Reiss <breiss@utah.gov>

Subject: RE: Notice of Intent to File EE for Wildfire Smoke

Richard,

That is our assessment. The documentation is near complete. It has to go to public comment so I'm thinking we could deliver late November.

On Sep 8, 2017 10:51 AM, "Payton, Richard" <Payton.Richard@epa.gov> wrote:

Thanks Joel.

Since I am no longer involved with the Utah data and SIP activities on a daily basis, it would help if you identified the regulatory action you expect the data to impact when you provide an initial notification. The CFR says we need to jointly determine "whether the identified data may affect a regulatory determination", and the specific determination the data impacts enters into a jointly agreed to due date for the demonstration submittal to EPA.

In talking to Crystal, it looks like the 2017 data will enter into trying to determine whether the Logan NAA has attained the NAAQS with 2017 data. Currently, the Smithfield monitor has 100% data capture for January through July of 2017. That implies that the Smithfield 98th percentile for 2017 will be the 8th maximum value. For Jan.-July value, the current 8th maximum given for the monitor is 37 ug/m3, according to an AQS AMP355 report I ran this morning. August 6 and 7, if included in the 2017 data would become the new 7th and 9th maximum values, and raise the 8th max from 37 to 39.8 ug/m3. The August 6 and 7 data therefore look like they will impact the 2017 design value calculation and attainment determination, provided that no values in late 2017 exceed 39.8 ug/m3. Usually, I would advise that we wait for all the 2017 data to be collected, in order to be certain the August values will in fact had significance and necessitated a demonstration, but given the need to assess attainment early in 2018, I understand that you will need to prepare the demonstrations and potentially put them out for public comment before the end of 2017.

Let me know the timeframe you might expect for completing the demonstration and the comment period, just so we can document the date as part of our initial notification discussions.

Thanks,

Richard Payton

EPA Region 8 Air Quality Monitoring

[\(303\) 312-6439](tel:(303)312-6439)

From: Joel Karmazyn [mailto:jkarmazyn@utah.gov]

Sent: Thursday, August 24, 2017 11:21 AM

To: Payton, Richard <Payton.Richard@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>

Cc: Ostigaard, Crystal <Ostigaard.Crystal@epa.gov>; mberger@utah.gov; Bill Reiss <breiss@utah.gov>

Subject: Notice of Intent to File EE for Wildfire Smoke

In accordance with EPA policy, Utah DAQ is providing advance notice of intent to file documentation for a wildfire smoke event that increased the PM2.5 above the 24-hr

standard at Smithfield on August 6 (40.6 ug/m³) and 7 (39.6 ug/m³). We expect that the elevated levels will have a regulatory impact as it applies to the Logan PM_{2.5} nonattainment area. The smoke plumes were a mix emanating from Idaho, Nevada, California and possibly Oregon.

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